

Questions from our consultation

This form sets out the questions we ask in a consultation on restoring and expanding open habitats from woods and forests in England that we launched on 12 March 2009. The consultation ends on 5 June 2009. You can find the consultation at www.forestry.gov.uk/england-openhabitats-consultation or contact Dominic Driver, Forestry Commission for further information (contact details below).

Comments on any aspect of the consultation are welcome, but we are particularly interested in your responses to the questions below. This form is available at www.forestry.gov.uk/england-openhabitats-consultation.

Your name:	Alastair Kerr
Your organisation (if any):	Wood Panel Industries Federation (WPIF)
Date:	03/06/09

No	Question.
The nature of the change	
1.	Does your aspiration for the scale of the policy fit within our calculated range of 5,600 to 30,000 ha of restoration or expansion of open habitats from woodland or forest over 10 to 15 years? This is 370 to 3,000 ha each year. What level of intervention would you prefer and how is this justified?
<p>The WPIF would prefer the minimum level of intervention, unless sufficient compensatory planting was implemented to achieve a net rate of afforestation. The minimum level is justified because of the deleterious effect on the wood processing industries of reducing England's productive woodlands. Even the suggested net deforestation threshold rate would likely be damaging as it does not calculate a net impact on productive forests.</p> <p>The acceptability of the threshold must not be judged in isolation. Softwood supply is already under great strain from several other factors, including Red Band Needle Blight (RBNB), Keepers of Time and renewable energy incentives. Overall, 70% of Corsican Pine stands have been infected with RBNB. Considering that Corsican Pine comprises 28% of FCE's coniferous planted area, RBNB in itself is likely to reduce severely the supply from FCE woodlands. Keepers of Time has the potential to affect 51,000 ha of the FCE's portfolio. Combined with RBNB-infected areas and the higher rate of woodland removal suggested in this consultation, 122,000ha of coniferous woodland are potentially at risk - over a third of England's entire coniferous plantation, including the private sector.</p>	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>On the whole, this is a reasonable list of desired outcomes. However, the "timber sector activity" outcome is ambiguous. Considering the existing pressure on biomass from the renewable energy sector and ROCs, confidence in the harvested wood products sector is already low. Any reduction in commercial timber production will further shake that confidence. In addition, the Forestry Commission has reduced long-term contracts across</p>	

No	Question.
	<p>the UK. This trend should be reversed if confidence is to remain in the wood market. A comprehensive survey of supply and demand for wood in the UK is necessary now, before 2011, on which to build an assessment of the likely impact of this policy.</p>
<p>Measuring the success of the policy</p>	
3.	<p>Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?</p>
<p>Policy proposals</p>	
<p>Elements present in the policy</p>	
<p>We will treat woodland and open habitats as potentially mutually beneficial</p>	
4.	<p>Do you agree that woodland and open habitats are potentially mutually beneficial? Is promotion of this idea helpful in gaining support for open habitat restoration and expansion from woodland?</p>
<p>A presumption against removal of 'mature native woodland'</p>	
5.	<p>Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?</p>
<p>6. What do you think of our proposed outline definition of 'mature native woodland'?</p>	
<p>We will expect practitioners to help local users to participate in development of the initial proposals</p>	
7.	<p>Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?</p>
<p>We will promote mechanisms for prioritising woodland removal at a regional level</p>	
8.	<p>Do you agree that prioritisation at a regional level is appropriate for this policy?</p>
<p>We will apply a framework for evaluation to projects</p>	
9.	<p>Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?</p>

No	Question.
10.	How much and what kind of support do you think we should give to practitioners to help them evaluate their projects using this framework?
To avoid net deforestation in England we will try not to go over a threshold rate of woodland removal due to restoring and expanding open habitats.	
11.	Do you agree with the principle of an England scale threshold rate of woodland removal? What is your preferred mechanism by which such a threshold could be applied to policy?
<p>We agree that there should be an England scale threshold rate of woodland removal. As stated in the consultation document, England's woodland cover is still one of the lowest in Europe - a quarter of the EU average. It would be unacceptable to allow England's total woodland cover to reduce at all. The Forestry Commission must address the significant drop in new planting over the last three decades.</p> <p>The threshold only covers total woodland area, not productive woodlands. There needs to be some mechanism to ensure that softwood production is not significantly reduced by this policy. This may require compensatory planting in other areas to secure supply in the long term.</p>	
12.	Do you consider that the proposed threshold is about right, too high or too low?
<p>We consider the proposed threshold to be too high, because it does not appear to factor in the loss of woodland as a result of other factors, including Keepers of Time, increased incentives to produce wood for fuel and the impact of Red Band Needle Blight.</p> <p>There are serious doubts concerning the comparability of new planting rates and removal rates, in terms of the impact on wood production. Heathland, which will be targeted by this policy, has traditionally been planted with or colonised by Scots pine. Also, most recent planting has been uneconomic for the wood processing industries and unsuitable material for the wood panel industry. Therefore, it should not be used as a threshold measure against woodland removal. In essence, we cannot support a policy that would see a reduction in productive forestry.</p>	
Key variables	
What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?	
13.	Is there a way, in the short term, we can better estimate the contribution to biodiversity objectives from different levels of restoration or expansion of open habitats?
14.	Do you agree that management practices to minimise carbon emissions during restoration or expansion of open habitats should be adopted? Do you agree with the

No	Question.
	outline practices presented? How could we best ensure that such practices are adopted?
15.	Do you agree that it is appropriate to include impact on long-term average carbon store <i>and</i> loss of potential to substitute timber for higher carbon materials and fuel in the calculations on carbon balance?
	<p>Yes, it is appropriate to include loss of potential to substitute timber for higher carbon materials and fuel. The wood panel industry, which is dependent on UK sources of wood, produces materials that lock carbon away for up to 60 years and sometimes more. It is also one of the largest generators of renewable heat in the country, produced using process-derived residues from UK wood.</p>
16.	Where do you think the appropriate balance lies between achieving biodiversity objectives and the need to reduce carbon emissions? What processes might help to make this judgement?
Should we be managing open habitats to keep them in 'favourable condition' or should we adopt a more dynamic approach to land management?	
17.	Outside SSSIs, do you agree that a more dynamic attitude to land management could deliver equivalent or greater gains for open habitats and species than one where success for all sites is based on assessments of condition as applied to SSSIs?
18.	If so, how might such an approach be developed? Is there scope for modifying the conservation objectives on some SSSIs to incorporate a similar approach? If not, do you consider that the endpoint for all restoration proposals should be judged against favourable condition as defined for SSSI habitats?
What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?	
19.	Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?
	<p>In formulating this policy, the FCE should take into consideration both the state of wood supply and demand across the UK and the Government's existing policies that affect timber production and economic activity in this sector. Although future and existing supply is addressed in this consultation, demand for wood is not. Supply for the wood panel industry is already extremely tight - there is no surplus of many wood products, including sawmill residues.</p> <p>The 2006 report produced by John Clegg Consulting, "Forecast Wood Fibre Availability and Demand in Scotland & Northern England to 2016", predicted that demand would outstrip supply for UK wood from 2008. This report did not include the massive potential increase in demand from the energy sector (especially co-firing), incentivised by the</p>

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	<p>Renewables Obligation.</p> <p>Although the lower rate of woodland removal here suggested would not itself have a significant impact on wood supply to our industry, the cumulative effects of this policy and other recent factors could bring the market to a critical point for our industry - i.e. wood prices would rise to an uneconomic level and the industry would not be able function.</p> <p>We are concerned that the Open Habitats policy is being made without due consideration of the Government's renewable energy policies. In the sub-section, "Impact on businesses", in 6.2.3, several factors are listed, including reduction in timber supply and availability. What is missing is the increased demand result from ROCs and, in the future, the renewable heat incentive.</p> <p>A more explicit link should be made between hardwood and softwood markets. Removal of some or all of the 45,200ha of hardwood would mainly affect the woodfuel market. However, this could have an important knock-on effect on wood processing; if hardwood availability decreases, the renewable energy sector will turn to softwood, thus further distorting that market.</p> <p>Finally, a reduction in softwood supply in England will no doubt put increased pressure on the limited supply of high-grade recovered wood. This material is primarily recycled by the wood panel industry, though it is also important to the animal bedding industry. It is vital that wood availability and demand are assessed in the round, as pressure on one area - e.g. demand for small roundwood - will have a knock-on effect on other wood supply chains, especially with the increased and subsidised competition from the energy industry.</p>
<p>Different approaches to applying policy</p>	
20.	<p>Which of the three approaches by which we make decisions about woodland removal is your preferred option? Can you see any alternative types of approach based either on a combination of these approaches or on new ideas?</p>
<p>Although all three approaches clearly have merits, the third is essential. An alternative approach could match "appropriate scale and pace" with prioritising new woodland planting.</p>	
<p>The role of compensatory planting</p>	
21.	<p>What is the appropriate role of compensatory planting in this policy?</p>
<p>If the Open Habitats policy is to be implemented at a significant rate, compensatory planting is essential. Not only does the Forestry Commission have a duty to protect supply to the forest industries, as it has traditionally done, it must also address the paucity of England's woodland cover. Restoration of heathland etc is not a bigger priority than the health of existing industries and the UK's climate change imperatives.</p>	
<p>Factors to consider when deciding which policy is likely to work best</p>	
22.	<p>Have we developed a reasonable set of questions for informing the decision on which policy is best? Do you wish to suggest any changes to the list of questions?</p>
<p></p>	

No	Question.
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
Other comments	
We welcome your input on any other aspect of this consultation.	
We welcomed the recognition that "many of the [forestry] businesses are in rural areas where their contribution to local employment may be disproportionate." Were the cumulative effect of significant woodland removal and increased demand for wood to be the closure of some of the wood panel plants, local employment, both direct and indirect, would be a serious consequence and further financial burden on the state.	

Please include the "information about you" form with your response.¹

Please send your completed forms to:

[Dominic Driver](#)

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By 17.00hrs, Friday 5 June 2009.

¹ See www.forestry.gov.uk/england-openhabitats-consultation for a copy.